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Attorneys for Defendant  
United States Department of Homeland Security

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION**

GONZALES & GONZALES BONDS  
AND INSURANCE AGENCY, INC.,

Plaintiff,

vs.

UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY,

Defendant.

Case No. C 11-02267 DMR

Honorable Donna M. Ryu

**STIPULATION AND [REDACTED]  
ORDER EXTENDING THE DEADLINE  
FOR PLAINTIFF TO FILE MOTION FOR  
ATTORNEY'S FEES AND BILL OF  
COSTS**

1 Plaintiff Gonzales & Gonzales Bonds and Insurance Agency, Inc. (“G&G” or  
2 “Plaintiff”) and Defendant United States Department of Homeland Security (“DHS”), by and  
3 through their respective counsel, make the following representations and stipulate and agree as  
4 follows:

5 G&G and DHS have agreed in principle to a settlement regarding G&G’s motion for  
6 attorney’s fees and bill of costs based on the Court’s Order of December 21, 2012, which ruled  
7 upon the parties’ motions for summary judgment in this Freedom of Information Act case.  
8 The parties have drafted a settlement agreement and expect to be able to finalize the agreement  
9 once the timing of the settlement payment is determined. The parties should know this very  
10 shortly.

11 The current filing deadline for the motion and bill of costs is August 2, 2013. The  
12 parties agree that an extension to August 9, 2013 should allow for enough time to enter into a  
13 written settlement agreement. The parties therefore respectfully request that the Court approve  
14 this requested extension.

15 This is the eighth requested extension of the original January 4, 2013 deadline.

16 DHS’ deadline for filing opposition to G&G’s motion for attorney’s fees and bill of  
17 costs would continue to be 30 days from the filing of G&G’s motion and bill of costs.

18 The requested extension would not affect the schedule for the case.

19 Nothing herein shall constitute a waiver of DHS’ right to oppose or object to G&G’s  
20 motion for attorney’s fees and bill of costs.

1  
2  
3 Dated: July 26, 2013

Respectfully submitted,

ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP

4 /s/ David R. Ginsburg

5 Gary A. Nye

6 David R. Ginsburg

7 Attorneys for Plaintiff

Gonzales & Gonzales Bonds and Insurance

Agency, Inc.

8  
9  
10 Dated: July 26, 2013

Respectfully submitted,

MELINDA HAAG

United States Attorney

11  
12 /s/ Ann Marie Reding

13 ANN MARIE REDING

Assistant United States Attorney

Attorneys for Defendant

Department of Homeland Security

**[PROPOSED] ORDER**

Pursuant to the stipulation by the parties, the Court extends from August 2, 2013 to August 9, 2013, the deadline for G&G to file its motion for attorney's fees and its bill of costs. DHS' deadline to file opposition to G&G's motion for attorney's fees and bill of costs will remain 30 days from the filing of G&G's motion and bill of costs.

IT IS SO ORDERED.

Dated: July 14, 2013



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THE HONORABLE DONNA M. RYU  
UNITED STATES MAGISTRATE JUDGE